

brownrudnick

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March 28, 2023

VIA ECF

The Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: United States v. Kwok et al., Case No. 1:23-cr-00118 (AT)

Dear Judge Torres,

On behalf of Ho Wan Kwok, we respectfully request that the Court schedule a bail hearing in this matter. Mr. Kwok was arrested on March 15, 2023, and presented that same day before Magistrate Judge Katharine H. Parker. During the hearing, Magistrate Judge Katharine H. Parker detained Mr. Kwok on consent without prejudice.

We respectfully move for a revocation of the detention order pursuant to 18 U.S.C. § 3145(b). We have conferred with counsel for the Government and have been informed that the Government continues to oppose bail in this case. Therefore, we respectfully request a bail hearing to present our proposed bail package scheduled at Your Honor's earliest convenience.

Respectfully submitted,

BROWN RUDNICK LLP



Stephen R. Cook

cc: All counsel of record